

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Lionel Williams

Case No.

Case: 2:23-mj-30153

Assigned To : Unassigned

Assign. Date : 4/12/2023

Description: RE: SEALED
MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 29, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: April 12, 2023City and state: Detroit, MI*Complainant's signature*

Daniel Scott, Special Agent, FBI

Printed name and title*Judge's signature*

Hon. David R. Grand, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Daniel Scott, being first duly sworn, hereby depose and state as follows:

I. Introduction and Background

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since December of 2010. I am assigned currently to the FBI Detroit Division's Violent Crime Task Force ("VCTF"). As an FBI Special Agent, I have conducted or assisted in numerous federal and state investigations, including crimes of violence and violations of drug trafficking and firearms statutes.

2. The statements contained in this Affidavit are based on my experience and background as an FBI Special Agent and on information provided by police officers, other agents of the FBI, and other law enforcement personnel, as well as communications with others who have personal knowledge of the events and circumstances described herein.

3. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

4. The FBI is currently investigating Lionel WILLIAMS (DOB: XX/XX/1968). Probable cause exists that WILLIAMS, a convicted felon, was

unlawfully in possession of a firearm and ammunition within the Eastern District of Michigan on June 29, 2022, in violation of 18 U.S.C. § 922(g)(1).

5. I have conducted a criminal history check (CCH) for WILLIAMS.

WILLIAMS has been convicted of the following felony offenses:

- a. 1989 – Controlled Substance – Dealing/Manufacturing (Cocaine, Heroin or another Narcotic) less than 50 grams.
- b. 1989 – Stolen Property.
- c. 1994 – Weapons – Carrying Concealed.

6. Because WILLIAMS has been convicted of multiple felony offenses and has served a period of incarceration in the Michigan Department of Corrections (MDOC) there is probable cause that WILLIAMS is aware of his status as a convicted felon.

II. Probable Cause: June 29, 2022

7. On June 29, 2022, at approximately 8:00 a.m., officers of the Detroit Police Department (DPD) responded to a non-fatal shooting at 820 West McNichols, Detroit, MI, within the Eastern District of Michigan. Upon arrival, the DPD officers observed an adult victim (AV-1) who sustained a gunshot wound to the left hip area.

8. The responding officers recovered one brass 9mm Luger spent casing and observed blood on the concrete.

9. Detroit Crime Intel reviewed surveillance video from project Greenlight cameras and observed the incident. After review of the surveillance video, police observed what appeared to be a verbal altercation between AV-1 and WILLIAMS. WILLIAMS pulled out a handgun from his waistband and fired a shot at AV-1. Detroit Crime Intel advised they observed the suspect get into a red Chevrolet Malibu bearing Michigan license plate DEC 707. Per the Michigan Secretary of State, the registered owner of the red Chevrolet Malibu, license plate DEC 707, was Lionel WILLIAMS with residence address 84 Geneva Avenue, Highland Park, MI. WILLIAMS' address is less than a half mile from the incident location.

10. When comparing the suspect depicted in the Greenlight video and Secretary of State records, officers of the Detroit Police Department were able to confirm the person to be the same, Lionel WILLIAMS.

11. On June 29, 2022, officers of the Detroit Police Department conducted a state search warrant for the registered address of WILLIAMS. During the search, WILLIAMS advised the officers he was hiding in the attic. Additionally, WILLIAMS advised the officers where a handgun was located in the residence. Police located an additional revolver handgun inside of a clothing basket, along with clothing consistent with what the suspect wore during the shooting. In total, the officers recovered two firearms from the residence: one

stolen Smith and Wesson 9mm (with at least 1 live round of ammunition) and one Smith and Wesson revolver (with 5 live .38 caliber rounds of ammunition).

12. The recovered Smith and Wesson 9mm taken from WILLIAMS' residence was submitted to the National Integrated Ballistic Information Network (NIBIN) and was met with positive results. NIBIN is an automated ballistic imaging network that provides law enforcement with the ability to compare fired casings from crime guns with other such casings to connect crimes. NIBIN provided the recovered Smith and Wesson 9mm was also used on August 10, 2021, at 820 West McNichols, Detroit, MI in an aggravated / felonious assault. This is the same location as the June 29, 2022, non-fatal shooting involving WILLIAMS. The comparison results from the casing recovered on June 29, 2022, and the recovered Smith and Wesson 9mm are still pending.

13. On April 11, 2023, ATF Special Agent Pharr, an expert in the interstate nexus of firearms, advised me that the firearms recovered from WILLIAM's residence were each a firearm as defined under 18 U.S.C. § 921 and was manufactured outside the state of Michigan and therefore traveled in and affected interstate commerce.

Conclusion

14. Based on the above information, probable cause exists to believe that WILLIAMS, a previously convicted felon, knowing that he was previously

convicted of an offense punishable by more than one year of imprisonment,
knowingly possessed a firearm and ammunition, in violation of 18 U.S.C. §
922(g)(1).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. C. Scott", written over a horizontal line.

Daniel C. Scott, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my
presence and/or by reliable electronic means.

A handwritten signature in blue ink, appearing to read "David R. Grand", written over a horizontal line.

HONORABLE DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

Dated: April 12, 2023